

EXHIBIT A

Roman, Michael

From: Rodgers, James
Sent: Tuesday, February 11, 2025 5:35 PM
To: Mackenzie Pensyl; joseph.macy@clydeco.us
Cc: James Chapman; W. Ryan Snow; Lisa Hirschman; Tressa Lucas; Roman, Michael; Johnson, Dawn; Werner, Rachel; Cohen, Harry
Subject: RE: Carver Marine Towing/NPBL [CC-US.980000.981028.FID1207794]

Mackenzie,

In addition, your request failed to be served on Harold Cohen, the sponsoring attorney of record for us in the EDVA

Please add Harold to your service as well Michael Roman.

Thank you,
Jim

From: Rodgers, James <James.Rodgers@clydeco.us>
Sent: Tuesday, February 11, 2025 6:20 PM
To: Mackenzie Pensyl <mpensyl@cwm-law.com>; joseph.macy@clydeco.us
Cc: James Chapman <jchapman@cwm-law.com>; W. Ryan Snow <wrsnow@cwm-law.com>; Lisa Hirschman <lhirschman@cwm-law.com>; Tressa Lucas <tlucas@cwm-law.com>; Rodgers, James <James.Rodgers@clydeco.us>; Roman, Michael <Michael.Roman@clydeco.us>; Johnson, Dawn <Dawn.Johnson@clydeco.us>; Werner, Rachel <Rachel.Werner@clydeco.us>
Subject: RE: Carver Marine Towing/NPBL [CC-US.980000.981028.FID1207794]

Mackenzie,

We have not waived objections for the following reasons:

1. N&P served Initial RFD before Rule 26 Disclosures were due, and on the day of the Initial Conference;
2. N&P did not serve all counsel of record at our firm (I was e-mailed, but was out of town which my auto return email would have indicated). Please add Michael Roman to your service list;
3. The 15 day deadline cannot be enforceable as it lands on January 25th and the Order states that no party is required to respond to any discovery prior to February 4th. For clarity we will commence the fifteen days starting February 4th. Thus, if we have any objections, we will serve by February 19th.

Notwithstanding the above, we are endeavoring to respond to all requests at this time.

If you wish to discuss, please feel free to call me.

Regards,
Jim

From: Mackenzie Pensyl <mpensyl@cwm-law.com>
Sent: Tuesday, February 11, 2025 10:30 AM
To: Rodgers, James <James.Rodgers@clydeco.us>; joseph.macy@clydeco.us

Cc: James Chapman <jchapman@cwm-law.com>; W. Ryan Snow <wrsnow@cwm-law.com>; Lisa Hirschman <lhirschman@cwm-law.com>; Tressa Lucas <tlucas@cwm-law.com>

Subject: RE: Carver Marine Towing/NPBL

Counsel,

On January 10, 2025, the Belt Line propounded Requests for Production of Documents to Carver. Pursuant to Fed. R. Civ. P. 34, Carver had 30 days to respond, or until **February 10, 2025**. We have not received any responses and thus request that Carver provide them immediately to avoid a motion to compel. Please do not include objections, as those are waived under EDVA Local Rule 26 and Paragraph 3 of the Rule 26(f) Pretrial Order.

We look forward to receiving your responses.

My best,

Mackenzie

Mackenzie R. Pensyl, Esquire

CRENSHAW, WARE & MARTIN, P.L.C.



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From: Lisa Hirschman <lhirschman@cwm-law.com>

Sent: Friday, January 10, 2025 5:29 PM

To: james.rodgers@clydeco.us; joseph.macy@clydeco.us

Cc: James Chapman <jchapman@cwm-law.com>; W. Ryan Snow <wrsnow@cwm-law.com>; mnanavati@snllaw.com; zjett@butler.legal; Mackenzie Pensyl <mpensyl@cwm-law.com>; cjones@snllaw.com

Subject: Carver Marine Towing/NPBL

Good afternoon –

Attached please find Norfolk and Portsmouth Belt Line Railroad Company's First Request for Production of Documents to Coeymans Marine Towing, LLC d/b/a Carver Marine Towing.

If you have any questions, please let us know.

Thank you,

Lisa Hirschman, Legal Assistant

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